

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRUSTEES OF THE CHICAGO PAINTERS AND)
DECORATORS PENSION FUND, ET AL,)

Plaintiffs,)

v.)

PARAMOUNT DECORATING CO., a/k/a)
PARAMOUNT DECORATING, an Illinois)
corporation)

Defendant.)

Case No. 24-cv-7175

Judge John F. Kness

Magistrate Judge Young B. Kim

PLAINTIFFS' MOTION FOR JUDGMENT IN SUM CERTAIN

To the Clerk of the U.S. District for the Northern District of Illinois

Plaintiffs, by and through their attorneys, PAUL M. EGAN, GRANT R. PIECHOCINSKI, JAMES R. ANDERSON, and ARNOLD AND KADJAN, LLP, move the Clerk of the Court to enter an order of default against the Defendant. In support of their Motion, the Plaintiffs state as follows:

1. This is an action to recover fringe benefit fund contributions and other amounts due and owing based upon breaches of collective bargaining agreements, Declarations of Trust, and applicable provisions of the Employee Income Security Act of 1974 29 U.S.C. §1001 et seq. ("ERISA").
2. This case was filed on August 13, 2024.
3. The Defendant was served on October 15, 2024. (Docket Entry 7).

4. More than twenty-one (21) days have passed after service of process and the Defendant has not served an answer or any other responsive pleading.
5. On May 12, 2025, this Court directed the Clerk to enter a default against the Defendant under Rule 55(a) of the Federal Rules of Civil Procedure.
6. A fringe benefit compliance audit was completed for the period of October 20, 2022 through March 31, 2024. (Ex. A Richard J. Wolf Affidavit ¶2).
7. The audit revealed a total of \$18,077.17 (Ex A. ¶ 4).
8. Defendant has made a partial payment on the audit of \$5,465.17.
9. A balance of \$12,611.45 is owed on the audit for the period ending March 31, 2024.
10. Under Section 502(g)(2) Plaintiffs are entitled to reasonable attorneys fees and costs.
11. Plaintiffs have incurred \$3,465.00 in fees and costs in this litigation. (Ex. B Piechocinski Declaration ¶6).
12. Therefore, Defendant owes \$16,076.45 including attorneys fees and costs.

WHEREFORE, Plaintiffs pray for the following relief:

- A. That this Court enter judgement against the Defendant, Paramount Decorating Co. in the amount of \$16,076.45.

Respectfully submitted,

TRUSTEES OF THE CHICAGO PAINTERS et al,

By: /s/ Grant R. Piechocinski

One of Plaintiffs' attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of June, 2025, a copy of the foregoing was filed electronically. Copies will be sent to the following parties via U.S. mail.

Paramount Decorating Co., a/k/a Paramount Decorating, an Illinois corporation
c/o Christian Matthews, its Registered Agent
220 W. Oneida Avenue, Apt. 1
Barlett, Illinois 60103-4052

/s/ Grant R. Piechocinski

Grant R. Piechocinski